

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

T-MOBILE WEST LLC and INDEPENDENT
TOWERS HOLDINGS, LLC,

Plaintiffs,

v.

THE CITY OF MEDINA, WASHINGTON,

Defendant.

No. 2:14-cv-1455RSL

DECLARATION OF DARCEY
ESTES IN SUPPORT OF
PLAINTIFFS' AND
DEFENDANT'S REPLY IN
SUPPORT OF JOINT MOTION
FOR ENTRY OF STIPULATED
JUDGMENT

Darcey Estes declares and states:

1. I am employed by T-Mobile as Senior Director of Engineering Development for the West Region. T-Mobile's West Region covers from west Texas to Hawaii with more than 14,000 cell sites in 10 states. T-Mobile's West Region encompasses major metropolitan areas in which T-Mobile has field engineering offices that work on network development activities, including new cell site development and cell site upgrades, in that market. I am responsible to oversee all of these network development activities across the West region. I have been working in the wireless industry for 18 years evaluating, zoning and building new cell sites and upgrading existing cell sites.

2. I am over the age of 18 years, competent to testify herein, and make this declaration on personal knowledge of the facts stated.

3. I am thoroughly familiar with the proposal by Independent Towers to locate an 80 foot tall stealth monopole that would provide space for a T-Mobile wireless communications facility, together with other collocated wireless facilities, at a location in the southeast portion of the unforested area of Fairweather Park, adjacent to the tennis courts, in the City of Medina. I know that T-Mobile has been working for years with WSDOT to accommodate SR 520 construction and has had to relocate to temporary sites on two occasions. I am also familiar that T-Mobile has been working with the City of Medina for several years now to find a permanent cell site to replace the one that T-Mobile had to move from four years ago to accommodate the SR 520 bridge and highway construction project. T-Mobile needs a site of sufficient height to remedy a significant gap in wireless coverage in northern Medina. Rich Conroy, an RF Engineer, prepared an Expert Report identifying T-Mobile's gap in coverage and that the proposed 80 foot tower will remedy this gap.

4. I have visited Fairweather Park and examined the site covered in the Settlement Agreement, and have also reviewed several out-of-park locations which Intervenor's have identified as possible alternatives to the Fairweather Park site.

5. I have read and fully concur in Heather Gastelum's assessment of the feasibility of the alternatives identified by Intervenor's. None of the sites proposed by Intervenor's are lawful under the Medina City Code. All of the suggested alternatives are unavailable, unbuildable or would require even taller towers than that proposed for Fairweather Park. These taller towers would be closer to nearby homes than the shorter tower proposed to be built in Fairweather Park.

6. I declare under penalty of perjury under 28 U.S.C. § 1746 and the laws of the State of Washington that the foregoing is true and correct.

DATED this 25 day of June, 2015 at Bainbridge, Washington.


DARCEY ESTES